

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

CLARENCE J. PILCEK,

Plaintiff,

V.

**ANADARKO PETROLEUM
CORPORATION, THE GLOBAL EDGE
CONSULTANTS, LLC and
KATHRYN EBERWEIN,**

Defendants.

CIVIL ACTION NO. 4:16-CV-00656

JURY TRIAL DEMANDED

**JOINT MOTION TO FILE JOINT MOTION TO
APPROVE CONFIDENTIAL SETTLEMENT
AND TO FILE SETTLEMENT AGREEMENT UNDER SEAL**

Plaintiff Clarence J. Pilcek (“Plaintiff”) and Defendants Anadarko Petroleum Corporation, The Global Edge Consultants, LLC, and Kathryn Eberwein (“Defendants”) file this their joint motion to file their Joint Motion to Approve Confidential Settlement and to File Settlement Agreement Under Seal as follows:

1. Plaintiff Clarence J. Pilcek brought this case on March 11, 2016 to recover overtime wages and other damages allegedly owed to him by Defendants pursuant to the Fair Labor Standards Act (“FLSA”). (Doc. No. 1). Plaintiff and Defendants are hereinafter referred to as “the Parties.”

2. On October 20, 2016, a Settlement Conference was held before Magistrate Frances Stacy. The Parties reached a settlement at the Settlement Conference. The terms of the settlement were presented to Magistrate Stacy for approval and are confidential. A formal document memorializing the Parties' confidential agreement ("the Settlement Agreement") has

since been drafted and executed.

3. The Settlement Agreement is fully executed and the Joint Motion to Approve Confidential Settlement has been prepared. However, a term of the Settlement Agreement is confidentiality. Accordingly, the parties request leave to file the Joint Motion to Approve Confidential Settlement under seal.

JOINTLY SUBMITTED BY:

**Counsel for Plaintiff,
Clarence J. Pilcek:**

DOW GOLUB REMELS & GILBREATH,
PLLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was forwarded to all counsel of record via ECF delivery on December 16, 2016.

/s/ J. Alfred Southerland
J. Alfred Southerland